

SIDLEY

JENNER & BLOCK LLP

November 23, 2020

VIA ECF

The Honorable Ann M. Donnelly
United States District Court
Eastern District of New York
225 Cadman Plaza East
Courtroom 4GN
Brooklyn, NY 11201

**Re: *United States v. Huawei Technologies Co., Ltd., et al.*, 18 CR 457 (S-3) (AMD)(CLP);
Motion for a Bill of Particulars – Oral Argument**

Dear Judge Donnelly:

Defendants Huawei Technologies Co., Ltd., Huawei Device USA Inc., Huawei Device Co., Ltd., and Futurewei Technologies, Inc. (collectively, the “Huawei Defendants”) have filed a motion for a Bill of Particulars in the above-referenced matter. *See* ECF No. 174. The motion is fully briefed. Given the importance of the issues presented in the motion and additional disclosures made by the government after briefing, the Huawei Defendants respectfully submit that oral argument would be useful to assist the Court in the resolution of the motion. The Huawei Defendants suggest that oral argument be scheduled at the Court’s convenience, including potentially in connection with the next status conference that is scheduled for February 18, 2021 at 2:30 p.m.

The government has asked defense counsel to convey the government’s position that it does not believe oral argument is necessary in light of the parties’ extensive briefing, but that it defers to the Court. The government proposes that any such argument be held in connection with the February status conference.

United States v. Huawei Technologies Co., Ltd., et al., 18 CR 457
November 23, 2020
Page 2

Respectfully submitted,

By: /s/ Thomas C. Green
Thomas C. Green
Mark D. Hopson
Michael A. Levy
Joan M. Loughmane
Douglas A. Axel
Brian J. Stretch
SIDLEY AUSTIN LLP
1501 K Street, NW
Washington, D.C. 20005
Tel.: 202-736-8069
Email: tcgreen@sidley.com

By: /s/ David Bitkower
David Bitkower
Matthew S. Hellman
JENNER & BLOCK LLP
1099 New York Avenue, NW
Washington, D.C. 20001
Tel: 202-639-6048
Email: dbitkower@jenner.com

*Counsel for Defendants Huawei Technologies Co., Ltd., Huawei Device Co., Ltd.,
Huawei Device USA Inc., and Futurewei Technologies, Inc.*

cc: Government counsel (by ECF)